

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,)	
)	Case No. 17-cr-00134 (WMW-DTS)
Plaintiff,)	
)	
v.)	STATEMENT OF FACTS IN
)	SUPPORT OF EXCLUSION OF
John Kelsey Gammell,)	TIME UNDER SPEEDY TRIAL
)	ACT
Defendant.)	
)	

Pursuant to 18 U.S.C. § 3161(h)(7)(A), I, John Kelsey Gammell, the defendant in this case, agree to the following statement of facts in support of my motion to exclude time under the Speedy Trial Act. The discovery material in this case is voluminous. The alleged actions occurred across multiple jurisdictions. This is the first case charged in the District of Minnesota under 18 U.S.C. § 1030(a)(5)(A) and therefore particularly unusual. Moreover, the parties are engaged in ongoing discussions with the government about discovery issues. I am presently detained, complicating communications. My counsel and I need time to review the voluminous discovery and adequately prepare for pretrial proceedings.

Based on the above facts, I request that the period of time from now until August 18, 2017 be excluded from the time in which I would otherwise have to be brought to trial on my case.

I have discussed this matter with my attorney. I voluntarily make this request, with full knowledge of my rights under the Speedy Trial Act.

Dated: July 14, 2017

s/ John Kelsey Gammell

John Kelsey Gammell
Defendant

Dated: July 14, 2017

s/ Rachel K. Paulose

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